PH Harborwide FS SF

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ANCHOR QEA

23 S. Wenatchee Avenue
Suite 120
Wenatchee, Washington 98801
Phone 509.888.2070
Fax 509.888.2211

April 2, 2009

Chip Humphrey
Eric Blischke
EPA Operations Office
805 S.W. Broadway, Suite 500
Portland, OR 97205

Re: LWG GIS Tool
Project Number: 010142-01

Dear Chip and Eric:

Please find attached the updated GIS Tool. The tool includes some of the revisions that EPA requested at our GIS Tool check-in meeting including:

1. The GIS tool has been updated to provide the number of acres inside the lines representing background, PRG, and hilltop concentrations specified by the GIS tool user.
2. Surface samples and core samples have been given different symbols, with subsurface data available at the core locations. Sediment characterization using the natural neighbors analysis was still performed on surface data only.
3. The tool now has the capability to analyze sub-areas of the river including the following sub-areas:
    a. 1-river mile segments
    b. East and west sides of the river excluding the navigation channel.

At this time, the LWG continues to consider the GIS Tool to be a work in progress.

One issue we currently are looking into is the role of elevated non-detect concentrations in the contouring. Because the GIS Tool uses the RI surface sediment data with the conventions for data processing set forth for the RA, it is possible for concentration contouring to be based on non-detect data and in some cases relatively high non-detects.

EPA should be particularly aware that in these cases contouring may show areas of high concentration that are based primarily, or entirely, on non-detect data. This may occur in the case of chemicals expressed as total summations (e.g., total PCBs).

As the LWG moves forward with draft AOPC development in the coming months, we will examine the issue further, and for any maps created we will identify areas of high concentration contours that are not based on actual detected concentrations within the surface sediments. We will evaluate this issue and be prepared at the AOPC check-in meeting to discuss instances of high non-detects and to explain their role in contouring efforts and subsequent discussions of AOPCs.

Sincerely,

Carl Stivers
Anchor QEA, L.L.C.

Attachment (DVD)